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7 *California State University*

8  
9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
11

12  
13 **EDWIN HAMID NAHAVANDI,**

14 Plaintiff,

15 v.

16 **BOARD OF TRUSTEES OF THE**  
17 **CALIFORNIA STATE**  
**UNIVERSITY,**

18 Defendant.

2:24-cv-03791-RGK-MRWx

**DISCOVERY MATTER:**  
**DEFENDANT'S NOTICE OF**  
**MOTION FOR SANCTIONS**

**[Filed concurrently with Joint**  
**Stipulation; Declaration of Cristina**  
**M. Matsushima; [Proposed] Order]**

Date: March 28, 2025  
Time: 9:30 a.m.  
Courtroom: 750  
Judge: Magistrate Judge  
Charles F. Eick

Discovery Cutoff: April 11, 2025  
Pretrial Conference: June 23, 2025  
Trial Date: July 8, 2025  
Action Filed: May 7, 2024

1 PLEASE TAKE NOTICE that on March 28, 2025, at 9:30 a.m., or as soon  
2 thereafter as the matter may be heard before Magistrate Judge Charles F. Eick at the  
3 Roybal Federal Building and U.S. Courthouse, located at 255 East Temple Street,  
4 Los Angeles, California 90012, Courtroom 750, 7th Floor, Defendant Board of  
5 Trustees of the California State University (CSU) will and hereby does move for  
6 terminating sanctions and attorney's fees or, in the alternative, evidentiary sanctions  
7 against Plaintiff Edwin Hamid Nahavandi (Plaintiff).

8 CSU moves for sanctions against Plaintiff pursuant to Federal Rule of Civil  
9 Procedure 37(b)(2)(A) because Plaintiff's Written Disclosures and Interrogatory  
10 Responses are grossly deficient, fail to comply with the applicable Rules, and  
11 violate Magistrate Judge Charles F. Eick's December 18, 2024, Order (Discovery  
12 Order, ECF 67). In compliance with Rule 37(a)(1) and Local Rules 37, counsel for  
13 CSU conferred in writing and in person with Plaintiff regarding his deficient  
14 discovery responses, but Plaintiff has stated he does not intend to amend his  
15 responses.

16 This Motion is based on this Notice of Motion, the accompanying Joint  
17 Stipulation and Declaration of Cristina M. Matsushima, all pleadings and papers on  
18 file in this action, and such other matters as may be presented to the Court at the  
19 time of hearing.

20 Dated: February 25, 2025

Respectfully submitted,

21  
22 ROB BONTA  
Attorney General of California  
23 BENJAMIN G. DIEHL  
Supervising Deputy Attorney

24 /s/ Cristina M. Matsushima

25  
26 CRISTINA M. MATSUSHIMA  
Deputy Attorneys General  
27 *Attorneys for Defendant*  
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## CERTIFICATE OF SERVICE

Case Name: **Nahavandi v. Board of  
Trustees of the CSU**

No. **2:24-cv-03791 RGK(Ex)**

I hereby certify that on February 25, 2025, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

### DEFENDANT'S NOTICE OF MOTION FOR SANCTIONS

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

I further certify that some of the participants in the case are not registered CM/ECF users. On February 25, 2025, I have caused to be mailed in the Office of the Attorney General's internal mail system, the foregoing document(s) by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within three (3) calendar days to the following non-CM/ECF participants:

Edwin Nahavandi  
5710 Comanche Ave.  
Woodland Hills, CA. 91367  
[edwin.nahovandi@gmail.com](mailto:edwin.nahovandi@gmail.com)

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on February 25, 2025, at Los Angeles, California.

Cecilia Apodaca  
Declarant

*/s/ Cecilia Apodaca*  
Signature